

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>PLAINTIFF</b>	)	
<b>v.</b>	)	<b>Case No. 07 CR 843-13</b>
	)	
	)	<b>Judge Sidney Schenkier</b>
<b>TERRANCE SEWELL,</b>	)	
	)	
<b>DEFENDANT</b>	)	

**DEFENDANT SEWELL'S MOTION FOR A MODIFICATION OF  
TERMS OF RELEASE ON BOND**

Now comes Defendant Terrance Sewell, by and through his attorney and moves this Court to set modify the terms of his release change the condition from home incarceration to home detention with the changed condition that Mr. Sewell, after approval of his pretrial services officer be allowed to look for work for a specified number of days per week. Further Mr. Sewell requests that if he obtains suitable work as determined by his pretrial services officer, he be allowed to leave his place of residence to work based on a pre-arranged work schedule approved by his pretrial services officer. Mr. Sewell's attorney has spoken to Mr. Sewell's pretrial services officer, Pace Morrison, and he is supportive of these proposed modifications. In support of this motion, Defendant states the following.

1. This Court placed Mr. Sewell on bond with one principal condition that he be on home incarceration. He is complying with the terms of his release.
2. Mr. Sewell would like to obtain work so that he have some means of

financial support and also make clear his interest in being a productive member of society.

3. He requests that the terms of his release be modified to change the condition from home incarceration to home detention so that Mr. Sewell, after a work search schedule has been approved by his pretrial services officer, he can look for work for a specified number of days per week and hours per day.

4. If Mr. Sewell is successful in finding work, he asks that he his condition of home detention include a provision that he be allowed to leave his residence to attend work for a specified number of hours per day.

5. Mr. Sewell's attorney has contacted one of the AUSA's in this case to determine if the Gov't objects but has not yet heard back.

WHEREFORE DEFENDANT Sewell prays that this Court grant his motion to modify the conditions of his pretrial release to change home incarceration to home detention as specified above.

Respectfully submitted,

s/Steven Saltzman  
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